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6 and

7 MALHAR S. PAGAY (CA BAR NO. 189289) (*pro hac vice* pending)
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11 Attorneys for Wynn Las Vegas, LLC d/b/a Wynn Las Vegas

12 **UNITED STATES BANKRUPTCY COURT**
 13 **DISTRICT OF NEVADA**

14 In re:

15 WYNN LAS VEGAS LLC d/b/a/ WYNN LAS
 16 VEGAS, a Nevada limited liability company,

17 Plaintiff,

18 vs.

19 GGW DIRECT, LLC, a Delaware limited
 20 liability company; GGW BRANDS, LLC, a
 21 Delaware limited liability company; GGW
 22 EVENTS, LLC, a Delaware limited liability
 23 company; MANTRA FILMS, INC., a
 24 suspended Oklahoma corporation; BLUE
 25 HORSE TRADING, LLC, a California limited
 26 liability company; PEPE BUS, LLC, an inactive
 27 Montana limited liability company; SANDS
 28 MEDIA, INC., a revoked Nevada domestic
 corporation; JOSEPH R. FRANCIS, an
 individual; DAVID R. HOUSTON, an
 individual; and DAVID R. HOUSTON, LTD., a
 Nevada professional corporation, doing business
 as THE LAW OFFICE OF DAVID R.
 HOUSTON;

Defendants.

Adversary Case No.: 13-01050-MMN

Chapter 11

**SCHEDULING STIPULATION
 CONTINUING MATTERS SET FOR
 HEARING ON JULY 11, 2013 AND
 RELATED DEADLINES**

Hearing

Date: July 11, 2013
 Time: 10:00 a.m.
 Place: Courtroom 2
 U.S. Bankruptcy Court
 District of Nevada
 Foley Federal Building
 300 Las Vegas Boulevard South
 Las Vegas, Nevada 89101

PACHULSKI STANG ZIEHL & JONES LLP
 ATTORNEYS AT LAW
 LOS ANGELES, CALIFORNIA

Wynn Las Vegas, LLC d/b/a Wynn Las Vegas ("Wynn Las Vegas") and R. Todd Neilson, the chapter 11 trustee (the "Trustee") appointed in the respective bankruptcy estates of GGW Direct, LLC ("GGW Direct"), GGW Events, LLC ("GGW Events"), GGW Magazine, LLC ("GGW Magazine") and GGW Brands, LLC ("GGW Brands", and together with GGW Direct, GGW Events and GGW Magazine, the "Debtors" and, collectively, with Wynn Las Vegas, the "Parties"), through their counsel of record, hereby stipulate and agree as follows in accordance with the following facts and recitals:

RECITALS

A. On April 18, 2012, Wynn Las Vegas filed a complaint in the District Court of Clark County Nevada (the "Nevada State Court Action") against GGW Direct, LLC; GGW Events, LLC; GGW Brands, LLC; Mantra Films, Inc.; Blue Horse Trading, LLC; Pepe Bus, LLC; Sands Media, Inc.; Joseph Francis; David R. Houston and David R. Houston, Ltd.

B. On February 27, 2013 (the "Petition Date"), each of the Debtors commenced voluntary chapter 11 cases (the "California Bankruptcy Cases") in the United States Bankruptcy Court for the Central District of California (the "California Bankruptcy Court").

C. On March 21, 2013, Wynn Las Vegas filed a motion to appoint a chapter 11 trustee in each of the California Bankruptcy Cases (the "Trustee Motion").

D. On March 26, 2013, the Debtors removed the Nevada State Court Action to the United States Bankruptcy Court for the District of Nevada (the "Nevada Bankruptcy Court").

E. On April 1, 2013, the Debtors filed a motion to transfer venue of the Nevada State Court Action (the "Venue Transfer Motion") from the Nevada Bankruptcy Court to the California Bankruptcy Court.

F. On April 10, 2013, Wynn Las Vegas filed a motion (the "Remand Motion") to remand the Nevada State Court Action back to the Nevada State Court.

G. On April 11, 2013, the California Bankruptcy Court entered orders granting the Trustee Motion in each of the California Bankruptcy Cases.

H. On April 11, 2013, the Office of the United States Trustee appointed R. Todd Nielson as the chapter 11 trustee for each of the Debtors in the California Bankruptcy Cases.

I. Hearings to consider the Venue Transfer Motion and the Remand Motion were originally scheduled to take place on May 8, 2013, and the deadline to object to the Venue Transfer Motion and the Remand Motion in the Nevada Bankruptcy Court was April 24, 2013. On April 30, 2013, the Court entered that certain *Order Approving Stipulation Continuing Matters Set for Hearing on May 8, 2013 and Related Deadlines* [Docket No. 19], whereby the hearings on the Venue Transfer Motion and the Remand Motion were continued to July 11, 2013, beginning at 10:00 a.m., and the deadline to object to the Venue Transfer Motion and Remand Motion was continued to June 27, 2013.

J. The Parties are discussing Wynn Las Vegas's and Stephen A. Wynn's claims against the Debtors and a potential settlement of the claims that would, if approved, resolve the Venue Transfer Motion and the Remand Motion. Therefore, the Parties have agreed to continue the hearings regarding the Venue Transfer Motion and the Remand Motion for a period of approximately seventy (70) days, and to extend the Parties' respective objection and reply deadlines to each motion.

SCHEDULING STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED as follows:

1. The hearings regarding both the Remand Motion and the Venue Transfer Motion (collectively, the "Hearings") are continued to such time as the Court may set on September 16, 2013, or the first date thereafter that is convenient to the Court (the "Continued Hearing Date").

2. The deadline to file and serve objections to the Venue Transfer Motion and the Remand Motion shall be the date that is fourteen (14) days prior to the Continued Hearing Date.

3. The deadline to file reply papers to any filed objections to either the Venue Transfer Motion or the Remand Motion shall be the date that is seven (7) days prior to the Continued Hearing Date.

1 Dated: June ^{25th} 25, 2013

BROWNSTEIN HYATT FARBER SCHRECK, LLP

2 By:

Lawrence B. #10516

3 For: Mitchell J. Langberg

4 and

5
6 Dated: June __, 2013

PACHULSKI STANG ZIEHL & JONES LLP

7 By:

Malhar S. Pagay

8 Attorneys for Wynn Las Vegas, LLC, d/b/a
9 Wynn Las Vegas

10
11 Dated: June ²⁵ 25, 2013

KLEE, TUCHIN, BOGDANOFF & STERN LLP

12 By:

Matthew C. Heyn

13 Matthew C. Heyn
14 Counsel for R. Todd Neilson, Chapter 11
15 Trustee for each of the Debtors

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

1 Dated: June __, 2013

BROWNSTEIN HYATT FARBER SCHRECK, LLP

2 By:

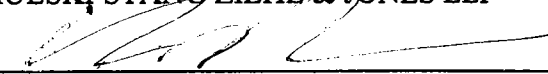
3
4 Mitchell J. Langberg

5 and

6 Dated: June ~~28~~, 2013

PACHULSKI STANG ZIEHL & JONES LLP

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8 
Malhar S. Pagay

9 Attorneys for Wynn Las Vegas, LLC, d/b/a
10 Wynn Las Vegas

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